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September 12, 2019

**VIA ECFS**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**RE: Notice of Ex Parte Presentation,** In the Matter of *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, and *Call Authentication Trust Anchor*, WC Docket No. 17-97

Dear Ms. Dortch:

On Tuesday, September 10, 2019, Joe Marion, President of the Cloud Communications Alliance (“CCA”), Clark Peterson, Chairman of the Board for the CCA and CCA members Armen Martirosyan, Chief Executive Officer of bluiip, Mark Ianuzzi, President of Telnet Worldwide, Alan Rihm, Chief Executive Officer of Coredial (for the meetings with Commissioner Michael O’Rielly and Travis Litman only) and Michael Pryor, Shareholder at Brownstein Hyatt Farber Schreck, held a series of separate meetings with the following individuals:

Commissioner Michael O’Rielly and Arielle Roth, Wireline Legal Advisor for Commissioner O’Rielly.

Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Jessica Rosenworcel.

Michael Scurato, Acting Legal Advisor for Media and Consumer Protection for Commissioner Geoffrey Starks.

Lisa Hone, Deputy Bureau Chief of the Wireline Competition Bureau, Pamela Arluk, Division Chief of the Competition Policy Division, Matthew Collins, Connor “CJ” Ferraro, and Jordan M. Reth of the Wireline Competition Bureau Staff, and Jerusha Burnett of the Consumer and Governmental Affairs Bureau Staff.

The purpose of the meetings was to introduce the Cloud Communications Alliance, the leading affiliation group representing the Cloud Communications industry. As reflected in the attachment, the rapidly growing association represents more than 100 of the world's leading cloud communications service providers and vendors. Its members offer highly innovative and sophisticated services that assist enterprises of all sizes to communicate with their customers and increase productivity through integrated communications tools. As the voice of the cloud communication industry, we discussed the CCA's increasing engagement with regulators, including the Commission. The CCA provides unparalleled access to thought leaders in this segment of the communications industry.

We noted that the cloud communications industry has made extraordinary inroads into the enterprise communications marketplace over the past few years. Market penetration for cloud-based services is approximately 25 percent of the enterprise market over all, and member companies routinely post annual growth rates of 30 to 40 percent.

During the meetings we also discussed the Commission's ongoing proceeding regarding the SHAKEN/STIR authentication framework consistent with CCA's comments and reply comments. We reiterated CCA's strong support for the Commission's efforts to combat illegal robocalls. The explosion of illegal calls devalues the network for everyone. We also noted that the SHAKEN/STIR framework was one of the most impactful undertakings effecting networks in many years. It is thus imperative that the framework be implemented in a manner that works for all providers. We want to move quickly, but we also want to make sure it is done correctly. In this regard, we urged the Commission to ensure that standards and protocols, such as certificate delegation and out-of-band signaling for TDM networks, are quickly finalized to enable enterprise service providers to attest to calls originating from their customers.

We further emphasized the need for the Commission to require entities blocking calls to have mechanisms to quickly unblock legitimate calls. Given the potential magnitude of blocking, industry may need to develop a more centralized mechanism to facilitate unblocking in a uniform manner. Finally, we reiterated CCA's comments calling on the Commission to exercise its oversight to ensure the framework is implemented in a non-discriminatory and competitively neutral manner and to be prepared to take strong action to enforce these fundamental precepts.

Please contact the undersigned if you have any questions.

Sincerely,



Joe Marion

cc: Arielle Roth (via email)  
Travis Litman (via email)  
Michael Scurato (via email)  
Lisa Hone (via email)  
Pamela Arluk (via email)

# We are the CCA

The Cloud Communications Alliance (CCA) is a special community of leading cloud communications companies. The CCA offers members exclusive resources and knowledge including events that are packed with presentations and information on topics of concern to the hosted communications industry plus access to the C-suite level cloud leaders.



Visit us at [cloudcommunications.com](http://cloudcommunications.com)

OUR MISSION IS TO BE THE INDUSTRY LEADER IN PROVIDING DIRECTION, BENEFITS, THOUGHT LEADERSHIP, AND GROWTH INITIATIVES, TO THE CLOUD COMMUNICATIONS MARKET, SERVICE PROVIDERS, AND IT'S VENDORS.



### THE KEY BENEFITS OF JOINING THE CCA

- Unparalleled access to the cloud senior leadership worldwide
- Multiple events in the US and globally providing industry leading speakers, best-practice sharing, and valuable networking opportunities
- CCA serves as the "Voice of the cloud communications Industry", providing you a voice with key analysts, investors, and press
- Regulatory guidance from some of the top legal and regulatory firms
- Guidance on the key initiatives and industry trends in the UCaaS, CCaaS, CPaaS, and other industry sectors to help you grow your business
- As a member of the CCA you will set your business apart as one of the leading businesses serving in the Cloud Communications industry
- The CCA publishes white papers, press releases, social media, blogs, and news stories that offer valuable exposure to your company
- Leading investors and M & A analysts firms are CCA MEMBERS providing insight to market trends to maximize valuation and partnering opportunities



#### MEMBERSHIP LIST

CompanyName	State	Country
2600Hz Inc.	CA	USA
888VoIP	NY	USA
Adamo Telecom Iberia S.A.U (ASOTEM)		Spain
AINEO Networks		Japan
Aire Networks del Mediterráneo SLU (ASOTEM)		Spain
Akixi Limited		United Kingdom
Alianza	UT	USA
Altus UC	TN	USA
Blueface Ltd.		Ireland
bluip	NV	USA
BroadSource Australia Pty Ltd		Australia
Broadvoice	CA	USA
Brownstein Hyatt Farber Schreck	DC	USA
CallCabinet	FL	USA
CallTower Inc.	UT	USA
Cavell Group		United Kingdom
Cisco Systems	MD	USA
CITELIA, S.A. (ASOTEM)		Spain
Cloud Age Solutions	VA	USA
Cloud Communications Alliance	FL	USA
Cooley LLP	VA	USA
CoreDial	PA	USA
Crown Software		Germany
dean one		Netherlands

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NEC Corporation of America	TX	USA

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Snom Technology GmbH		Germany
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